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FEDERAL ENERGY  
REGULATORY  
COMMISSION

November 17, 2000

RAYMOND S. KINDLEY  
Direct Line: (503) 796-2987  
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Mr. David Boergers, Secretary  
Federal Energy Regulatory Commission  
Room 1 A East  
888 1st Street NE  
Washington DC 20426

Re: Docket Number RT01-35-000  
Our File No. 071000-119321

Dear Mr. Boergers:

(4)  
Enclosed for filing are an original and 14 copies of Public Generating Pool, Public Utility District No. 1 of Douglas County, Washington, Public Utility District No. 2 of Grant County, Washington, and Public Utility District No. 1 of Pend Oreille County, Washington's, Motions to Intervene in the above noted docket.

Please date/time stamp the additional copy of this letter and Motions and return it to me in the enclosed self-addressed, stamped envelope.

Thank you for your assistance in this matter.

Sincerely,

  
Raymond S. Kindley

RSK:ard

Enclosures

cc: PGP Operating Committee  
PGP Administrative Committee

001121-01721

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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

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REGULATORY COMMISSION

Avista Corporation	)
Bonneville Power Administration	)
Idaho Power Company	)
Montana Power Company	)
Nevada Power Company	)
PacifiCorp	)
Portland General Electric Company	)
Puget Sound Energy, Inc.	)
Sierra Pacific Power Company	)

Docket No. RT01-35-000

**MOTION TO INTERVENE  
OF  
PUBLIC GENERATING POOL**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.214 (2000), Public Generating Pool ("PGP") hereby moves for intervention in the above-captioned docket. In support of its motion, the District states as follows:

**COMMUNICATION INFORMATION**

Communications and correspondence regarding this proceeding should be directed to:

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001121-0173-1

FEDERAL ENERGY  
REGULATORY COMMISSION  
NOV 20 2000

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### **INTERVENTOR**

PGP is a non-profit, voluntary association of five publicly-owned utilities located in the state of Washington. Its members are the Public Utility District No. 1 of Cowlitz County, Public Utility District No. 1 of Douglas County, Public Utility District No. 2 of Grant County, Public Utility District No. 1 of Pend Orielle County and The City of Seattle, City Light Department. PGP members own and operate federally licensed hydroelectric projects located in the state of Washington. PGP members trade extensively in power markets in the Pacific Northwest. PGP members greatly rely on the transmission facilities located in the Pacific Northwest for their power transactions.

### **BACKGROUND OF PROCEEDING**

Avista Corporation, Bonneville Power Administration, Idaho Power Company, The Montana Power Company, Nevada Power Company, PacifiCorp, Portland General Electric Company, Puget Sound Energy, Inc. and Sierra Pacific Power Company ("Filing Utilities") submitted to the Commission on October 16, 2000 a proposed compliance filing pursuant to Order No. 2000. The Filing Utilities also submitted on October 23, 2000 a Supplemental Compliance Filing and Request for Declaratory Order pursuant to Order No. 2000, in accord with 18 C.F.R. § 385.207(a)(2). The Filing Parties propose to

form a regional transmission organization in the Pacific Northwest and sections of the Southwest. The Filing Utilities refer to the proposed organization as RTO West. The Filing Utilities requested an expedited declaratory order from the Commission. They want the Commission to decide that various aspects of their proposal, i.e., scope, configuration and governance documents, comply with Order No. 2000.

### **PGP'S INTERESTS**

PGP members rely on transmission facilities owned and operated by the Bonneville Power Administration and other Filing Utilities in the Pacific Northwest to deliver and receive power. PGP members have long-term agreements with various members of the Filing Utilities for transmission service. Also, PGP members are periodically competitors of the Filing Utilities in the Pacific Northwest.

PGP participated in the public processes regarding the development of RTO West on behalf of its members. The Commission's disposition of the Filing Utilities' requests will have a direct and substantial impact on PGP members' interests and operations. PGP members decided to intervene jointly for administrative convenience and to reduce costs. PGP members intend to rely on PGP to represent their common interests in this proceeding. Each member, however, is a party of interest in its own right and wants to preserve its independent status and interests as an individual intervening party. Therefore, PGP submits that its intervention on the collective behalf of its members in this proceeding is in the public interest.

WHEREFORE, PGP moves the Commission to grant its invention.

Respectfully submitted,



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Of Attorneys for PGP  
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November 17, 2000

**CERTIFICATE OF MAILING (SERVICE LIST)**

I HEREBY CERTIFY that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

DATED at Portland, Oregon, this 17<sup>th</sup> day of November, 2000.

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1 - CERTIFICATE OF SERVICE

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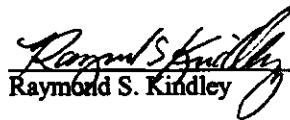
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1 - CERTIFICATE OF SERVICE